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Of Counsel to KRENKEL & KRENKEL, a New Jersey Firm

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Jennifer Shahade,

Plaintiff,

SUPERIOR COURT OF NEW JERSEY
MONMOUTH COUNTY, LAW
DIVISION

- against -

Docket No.

UNITED STATES OF AMERICA CHESS
FEDERATION an Illinois Corporation, a/k/a
UNITED STATES CHESS FEDERATION,
d/b/a US CHESS, RANDY BAUER,
individually and in his capacity as Board
President, PETER TAMBURRO, a New
Jersey resident, individually, JOHN and
JANE DOES 1-100, ABC COMPANIES
1-100, individually Persons or Entities
Defendants or unnamed or Unknown
including any such Civil Rico co-conspirators,

Defendants.

COMPLAINT AND JURY DEMAND

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TRIGGER WARNING

THIS LEGAL COMPLAINT INCLUDES GRAPHIC DESCRIPTIONS, DOCUMENT REFERENCES, VIDEO REPLAYS AND OTHER MEDIA INCLUDING VIVID DESCRIPTIONS OF SEXUAL VIOLENCE, ASSAULT, AND INCLUDES IMAGES OF SOCIAL MEDIA DOXING, AND ALSO REFERENCES SEXUAL PREDATORY CONDUCT ACROSS STATE AND INTERNATIONAL LINES -- SOMETIMES CALLED HUMAN TRAFFICKING, INVOLVING MINORS, CHILDREN AND OTHER UNPROTECTED VICTIMS.

SUMMARY STATEMENT OF THE CASE

1. Plaintiff Jennifer Shahade,



is a life member of US Chess and two (2) time National Women's Chess Champion. She is also a Team USA Chess Olympic Silver Medalist (2004) and has been a Woman Chess Grand Master since 2005.

2. In August 2011 and then again in March 2014, Shahade was physically and sexually assaulted by Chess Grand Master Alejandro Ramirez. In February 2023, Plaintiff publicly tweeted his name, because no effective punitive action had been taken against him by US Chess sufficient to

prevent him from having contact with other potential victims, including children.



Post



Jennifer Shahade ✓
@JenShahade

Time's up.

Currently there are multiple investigations underway on Alejandro Ramirez and sexual misconduct, including a series of alleged incidents involving a minor. I was assaulted by him twice, 9 and 10 years ago. I'd moved on until the past couple years, when multiple women, independent of each other and with no knowledge of my own experience—approached me with their own stories of alleged abuse. These accounts were from much younger alleged victims. I saw alarming evidence, including texts that admitted abuse of a minor while he was coaching her, as well as a text to an alleged victim about being an underage "temptress."

The road to investigation and potential consequences has been a very stressful process. You may have noticed I've taken a major step back from commentary as his plays out. I've filled the time with poker, writing and promoting girls in chess and yet a lot of that work to make chess more inclusive is futile if we cannot make crystal clear that the safety of women, girls, children is of the highest priority. And that's why I'm speaking out now. Thanks for your support and patience for more details. 🙏

10:02 AM · 2/15/23 From Earth · **2.6M** Views

477 Reposts **151** Quotes **4.7K** Likes **104** Bookmarks

3. Shahade was employed by US Chess from 2006 until she was constructively discharged on or about September 6, 2023, after coming forward and pressing her complaints. Prior to her constructive discharge Shahade was an Officer of US Chess and Director of Women's Programs.

4. On or about February 2023, Shahade became a public whistleblower about the numerous sexual abusers that US Chess allowed to be in an arena to sex traffic child chess players creating an environment that condoned and encouraged this conduct. Despite receiving warnings and complaints, US Chess failed to protect its most vulnerable from predatory gender violence, sexual assault and other kinds of predatory behavior. Shahade then followed up with US Chess because of its failure to take timely and appropriate action, including but not limited to her pleas to its Women's Committee.

5. On July 11, 2023, Shahade wrote an email reminding the Executive Director of her many warnings about Ramirez and asked US Chess to revise the statement that they reacted appropriately to her concerns. She offered to go over a detailed timeline with the Executive Board and additionally asked them to clarify support of her whistleblowing efforts. "I got a critical letter from US Chess counsel (about my tweet). But in fact, my whistleblowing was the correct action. US Chess leadership should clarify that my tweet was timely and appropriate, considering that Alejandro was slated to be on a chess team with two teenaged girls that same week...he was promptly removed after my tweet."

6. After she was constructively discharged on September 6, 2023, her last day of work and as a result of being a whistleblower, Shahade has been retaliated against with continued campaigns, including one inseminated from New Jersey, to gender attack her and discriminate against her both in New Jersey and nationwide, forcing her to lose her livelihood by being constructively discharged first in her position at US Chess, and then by damaging her credibility and reputation in order that the public would disbelieve her allegations. Further, when she continued to speak out against a social media campaign organized in part by Defendants to lessen the credibility of Shahade regarding her complaints of failures to guard the safety of chess players, especially children, and promote the alleged failures of US Chess, US Chess conspired with others to put Shahade in a false light and defame her

with individuals that US Chess had either a duty to control or by instigating and fomenting a public relations campaign against her that started in New Jersey and continue on its national publication website. As a result of this worship of the male Grand Masters and monetary big-name donors over those victimized, US Chess enabled the violent assaults on victim Shahade and others in the first instances, as well as her employability, stature in the chess community and her hard-earned worldwide reputation.

7. When Defendant US Chess thought it had beaten Shahade into submission, it then attempted to rush her into a sham mediation by having its then-Interim Executive Director, a former lawyer for a Fortune 500 company, send Shahade to mediation without an attorney, with a jurist it handpicked and set up dates to have such sham mediation, in its own backyard, Missouri, in order to silence her (upon information also hoodwinking the proposed jurist by failing to reveal the full story). When Shahade finally obtained legal counsel, Defendants failed to honor its offer to mediate because it never had any intention of having a real mediation to make Shahade whole but instead attempted to further victimize her to get her to sign a non-disparagement agreement and an NDA without real compensation for her claims against US Chess.

8. This action seeks to stop the willful, wanton, reckless, intentional and gross conduct against Shahade, restore her public self-worth and her reputation. Shahade hopes that in the future US Chess will right itself by finally and appropriately by responding to her victimization; and remedy and remediate its conduct that enabled women and minors to be assaulted.

9. This Complaint further charges the Defendants as operating as a Civil Racketeering Organization under N.J.S.A. 2C:41-1, et seq., the Racketeer Influenced and Corrupt Organizations (RICO) Act (New Jersey Civil RICO) statute, by engaging as a vehicle for such Human Trafficking, fraudulent government filing(s) related to its 501(c)(3) charitable tax-exempt status charitable

designation, further charges Retaliation under The New Jersey Law against Discrimination, Retaliation for complaints about Gender/Sex Victimization & Assaults/Battery, Defamation, Intentional and or Gross Negligent Infliction of Emotional Distress, Conspiracy to Damage Shahade's reputation both business and personal reputation, engaging in actions which place her in a False Light and Invading her Privacy including for releasing protected confidential information and engaging in victim shaming. And all other actions set forth herein based on these continuous and outrageous actions against Shahade, all the while protecting male chess grandmasters who were preying on women and children at chess tournaments in a misplaced attempt to keep US Chess reputation pristine.

PARTIES

10. Plaintiff Jennifer Shahade (hereinafter "Shahade" or "Plaintiff"), a resident of Pennsylvania by her attorneys, Linda Kenney Baden, Esq. and David Krenkel, Esq., complaining of Defendants, United States of America Chess Federation, a/k/a United States Chess Federation (hereinafter "US Chess"), an Illinois corporation operating nationally with business in fifty (50) states and internationally through its affiliates, Randy Bauer (hereinafter "Bauer"), individually and in his capacity as Board President individually and in his capacity as a RICO co-conspirator, Peter Tamburro (hereinafter "Tamburro"), a New Jersey resident, individually and in his capacity as a RICO co-conspirator, JOHN and JANE DOES 1-100, ABC COMPANIES 1-100, individually Persons or Entities Defendants or unnamed or Unknown including any such Civil Rico co-conspirators, who may be liable for the causes of action set forth herein, alleges:

JURISDICTION AND VENUE

11. This New Jersey Court has personal jurisdiction satisfying any State or Federal Constitutional Due Process requirements over the Defendants, acting directly or through its agents,

apparent agents, conspirators, members, donors, who committed one or more of the following where consistently and purposefully availed themselves of the privilege of conducting activities within New Jersey including publication, thus availing itself of both the benefits and protections of New Jersey law. As a result, it is now subject to jurisdiction of litigation venued in the great State of New Jersey with all the protections it also affords victims of discriminatory retaliation touching upon and in New Jersey for conduct as follows:

- a. The transaction of any business within the State;
- b. The commission of a tortious act within the State;
- c. The residence of any conspirator within this State;
- d. Agreement to form a conspiracy within the State;
- e. Publication within the State;
- f. Retaliation in violation of New Jersey Law Against Discrimination 10:5-1 within the State or New Jersey State Constitution or public policy within the State;
- g. Any other contacts including but not limited to inciting, condoning, inciting, fomenting the publication of an article by an agent retaliating against Shahade;
- h. Advertising, sponsoring chess or involvement in any New Jersey Club Chess federation;
- i. Any acts that violate the New Jersey Civil RICO statute as authorized by statute for the protection of the “rights of innocent persons”;
- j. The republication on a State and national level of a New Jersey based magazine written by a New Jersey resident.

NEW JERSEY CONTACTS AND FACTS

12. Since 1971, many of US Chess's annual National Events have been held in Parsippany, New Jersey: the World Team Chess Championships a/k/a US Amateur Team East. It was listed under the US Chess National Events page <https://new.uschess.org/national-events-calendar> which is published/advertised on Defendant US Chess webpage in all fifty (50) states including New Jersey. Thousands of children and adult players attend the event. Many of the worst and most dangerous chess players and alleged US Chess predators highlighted in recent years have attended this tournament including Alejandro Ramirez (Missouri) (2012) and Steve Shutt (Pennsylvania) (1992, 2012, and also attended most other years as a coach).

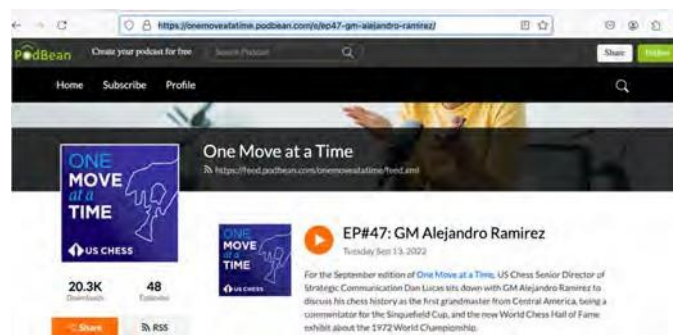
13. Former US Chess Board member Sam Sloan (hereinafter “Sloan”), who is an adjudicated attempted kidnapping felon (*Per Wikipedia*: In 1986, he was accused of kidnapping his daughter by the couple who had adopted her. He was convicted of attempted kidnapping in 1992 and served 18 months in a Virginia prison.) Sloan also played in the event in 2001, 2010 and 2014.

14. Additionally, a newly banned chess Master for violations of US Chess’s Safe Play Policy Tyrell Harriott (“hereinafter Harriott”) (New York) recently played in the 2024 edition of this tournament.

15. In 2012, then-celebrated chess coach and member of the US Chess Scholastic Council, Steve Shutt (hereinafter “Shutt”) celebrated his 70th birthday at the US Amateur Team/World Team in New Jersey and was also recognized by the organizer for his efforts on behalf of the event. In October and November 2018, Shutt was accused by over a dozen boys at the chess teams he coached, Vaux and Masterman, Philadelphia high schools of abuse, misconduct and sexual assault. Shahade was a student at Masterman when Steve Shutt coached.

16. Alejandro Ramirez, a Grand Master who sexually assaulted plaintiff twice, (hereinafter “Ramirez”) played in the World Team event in Parsippany, New Jersey in 2012. In 2016, he also played in a New Jersey tournament called "Millionaire Chess."

17. Upon information and belief, one of Chess Grand Master Alejandro Ramirez’ other victims are from New Jersey. Upon further information and belief, some of Alejandro’s victims played in New Jersey events where he also participated. He still appears as a guest in a widely-touted RSS interview podcast produced by US Chess that is available to listen to in New Jersey known as One Move at a Time <https://onemoveatathime.podbean.com/e/ep47-gm-alejandro-ramirez/>



18. Sloan wrote in 2001, before he joined the US Chess board, about playing "the most beautiful girl in the world," who was a **minor of only 14-years of age at the time**, at the same annual New Jersey tournament US Chess co-hosts. He has received no sanctions from US Chess and has played as recently as 2024. <http://www.anusha.com/alanna.htm>

19. Sloan further posted a photo of Plaintiff and other top women players **"Are these Floozies at the Bar or Chess Grand Masters?"** This photo was taken in New Jersey, at the World Team Chess Champs US Chess co-hosts.

<http://www.anusha.com/girls1.htm>



Elina Groberman, Irina Krush, Jennie Frenklakh and Jennifer Shahade, who are all grandmasters or International masters of chess

20. In other articles, Sloan commented about Plaintiff's appearance, and in another essay, he falsely claimed she was a lesbian and falsely claimed that she wrote a book which was about lesbians in chess.

21. At a 2006 US Chess Board meeting in New Jersey when Sloan was on the US Chess Board, he questioned Plaintiff's function and selection to the staff. Thereafter Plaintiff received subsequent notifications that he wanted her fired. Later, someone falsely signing as "Sam Sloan, US Chess Board Member" made grotesque comments about Plaintiff's body and sexuality in dozens of online message board posts. *"I must say Jennifer Shahade has the nicest pair of tits in chess. Too bad she's a lesbian. I wouldn't mind converting her though."* It was later determined by a US Chess report that these were composed by a different former US Chess Board member Paul Truong, who denied the allegations and later settled a lawsuit with US Chess. And yet, US Chess never took any action to specifically address the disturbing and homophobic posts against Shahade.

22. “DR,” a US Chess member who allegedly stalked two female chess players and sent e-mails to Plaintiff and other US Chess members to engage in his obsession, is from New Jersey. In 2012, Shahade e-mailed the Executive Director and the President of her concerns about DR and got no response. Then in 2017, she wrote another e-mail to US Chess staff about the alleged New Jersey stalker but again received no reply. The player’s record shows no sanctions, and he played in New Jersey as recently as 2024.

23. Timur Gareyev (hereinafter “Gareyev”) another Grand Master, played the 2021 US Open in Cherry Hill, New Jersey, where a woman who has chosen to remain anonymous, who alleged that Gareyev assaulted her, was also present. A senior US Chess official was assigned to “escort her around the playing hall to ensure her safety in case Gareyev appeared.” At the time, multiple sexual assault reports from US Chess Events had already been submitted about Gareyev. One allegation was described in an article "Breaking the Silence" on lichess.org: "Timur spins around quickly, pins my arms to my sides, and tries to kiss me, aggressively. His fingers were digging into my arms. I cannot get free. I was turning my head side to side, saying, ‘No Timur. Stop. I don't want this.’ I can still feel his beard on both of my cheeks as I am struggling. He said, ‘But, I just want to ...’ He was holding my arms with both hands.... Everything happened so quickly, but I was powerless to stop it." Gareyev was only banned finally in November 2023, after another female victim who was inspired by Plaintiff Shahade, came forward. The US Open was previously held in New Jersey four other times: 1972, 1986, 2002 and 2007.

24. In 2022, US Chess's World Team Chess Championships in New Jersey, by audience approval, acknowledged that the best team name out of hundreds of entries was "She Said She was 1800." According to an observer writing for the Marshall Chess Club newsletter, “the room burst into deafening applause when Steve Doyle said the name of the clear winner: “She Said She was 1800.”

This is a joke about statutory rape, instead of "She Told me She was 18," they sub in a chess rating, "1800." Shahade immediately contacted the tournament organizer Steve Doyle to remove the name and retract the prize. He argued with her, and suggested she was paranoid for thinking the name was bad. Shahade received a similar response from a Senior US Chess Staff Member who also mocked her for thinking it was a bad name. However, within 24 hours or so, the name was removed from some websites. (The team was/is still the official prize winner.) Photo below showing the New Jersey State Banner for the chess federation.



25. Shahade pleaded with the US Chess Women's Committee that the alleged independent investigation as to whether US Chess had properly taken the complaint against Grand Master Ramirez seriously for being a predator was not right, morally or legally, and that she could not accept the fact that US Chess did not discipline Ramirez quickly, appropriately or prevent him from having access to other potential victims. Upon information and belief, in the summer of 2023 -- before Shahade was constructively discharged US Chess on September 6, 2023, her last day of work -- a New Jersey chess federation member was accused of sexual assault of a minor using the Safe Play Form portal. Shahade brought the case to Carol Meyer (hereinafter "Meyer"), Executive Director of US Chess, who was dismissive and told Shahade "she'd file it," but US Chess did not

pursue it. However, the case was later re-opened at the insistence of US Chess member and New Jersey chess player Sean Finn herein after “Finn” as a result of his personal social media campaign. Finn has been one of the few vocal supporters of Shahade trying to get Defendants to do the right thing. Upon information and belief, the accuser declined to participate further in the US Chess investigation because she would not be protected. Why? Because US Chess President Defendant Randy Bauer (hereinafter “Bauer”) threatened to dox her on social media. Bauer further ludicrously claimed that because the then-Executive Director of US Chess Carol Meyer, (hereinafter “Meyer”) was female, no discrimination could be occurring, Meyer has stepped down since down from her position. Furthermore, Finn clearly put Bauer and US Chess on notice that Shahade had been retaliated against by Defendants.

Screenshot of the interactions of Finn and Bauer about Shahade.



26. In February 2024, US Chess Board member Leila D'Aquin, (hereinafter “D’Aquin”) (Louisiana) retaliated against Shahade with falsehoods at the US Chess/New Jersey Chess Federation tournament in New Jersey, telling people she was gaunt, unwell, a liar, traumatized and therefore not credible, and a gross falsehood – that Shahade was assaulted by a previous chess coach (who has also participated in the New Jersey tournament). This was not someone protected by US Chess, and not someone who assaulted or had any romantic or sexual relations with Plaintiff. This was a purposeful attempt to damage Shahade’s credibility and her circle. The retaliatory actions were broadcast so widely in New Jersey, that Shahade heard about it from multiple parties that had attended the event in New Jersey. New Jersey resident but herein uncharged RICO co-conspirator Pete Tamburro (hereinafter “Tamburro”) (New Jersey), Women’s Committee co-chair Kim Doo McVay (New Jersey) and Defendant Bauer (Iowa) were also present at this event. Here are two photographs of Bauer and Tamburro at the New Jersey Chess Federation tournament with their banner prominently displayed.





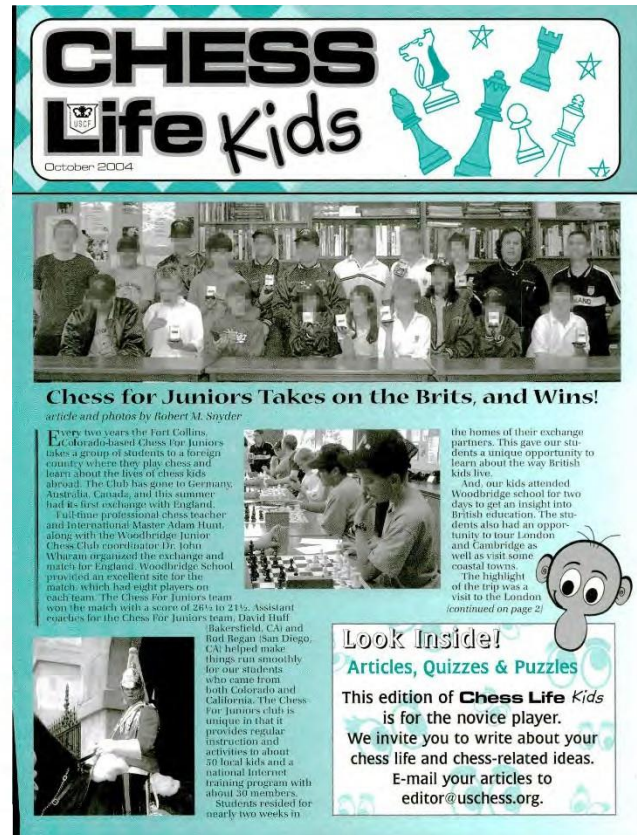
27. The American Chess Magazine, of which Tamburro is both senior editor and co-founder, wrote and published a retaliatory article on Shahade, where, in promoting his piece, non-party co-conspirator Tamburro said to "look out for his article in the magazine there." Tamburro never fact-checked the article with Shahade. Indeed, he had one goal: to put Shahade in a false light, invade her privacy, publish falsehoods about her, and thereby buttress the actions of US Chess by defrauding the public, US Chess contributors, donors, and tournament players who pay entry fees into falsely believing that US Chess takes prompt action to protect its players including minor children and women from sexual violence, gender assaults and predatory conduct.

28. In June 2024, Tamburro wrote an article for American Chess Magazine about the US Chess National Event, the 2024 US Amateur Team East in New Jersey, underlining the importance of the annual New Jersey event and his prominent role in representing US Chess there. "It's the closest thing to a national convention outside the US Open as US Chess President Randy Bauer made opening remarks. Executive Board Member Leila D'Aquin not only attended, but played," Tamburro wrote.

29. In 2007, convicted felon Sam Sloan (*Wikipedia*: In 1986, he was accused of kidnapping his daughter from the couple who had adopted her, and, in 1992, was subsequently convicted of

attempted kidnapping, and served 18 months in prison.) sued US Chess and several members of its representatives for one of the Board members Paul Truong (hereinafter “Truong”) allegedly impersonating him to make hundreds of profane internet posts, many of which attacked Plaintiff, and commented on sex acts, Shahade’s body, and more. “I love Jennifer Shahade's breasts. They are big and firm. My wife has no tits at all. Most Asian Women have no tits. But they compensate by giving great blowjobs. I wonder if Jennifer is good at it?” Truong denied the allegations. Even though the case was filed in New York and dismissed, US Chess was at the time represented by a *Newark, New Jersey lawyer*, Jeremy M. Brown, Esq. showing that Defendant US Chess does business in New Jersey.

30. On May 24, 2023, US Chess uploaded numerous archival magazines to its nationally distributed website to promote chess to children, claiming, "These archives are full of educational material perfect for chess players of all ages.” One upload was a magazine cover story on convicted pedophile Robert Snyder, who allegedly preyed on young US Chess members for years. Per *Wikipedia*: “Snyder has been arrested and convicted for multiple sexual assaults involving children dating back to 1983.” Snyder is photographed on the cover of a Chess Life Kids magazine human trafficking, taking children overseas from the U.S. Another story uploaded on May 2023, featured a laudatory cartoon on Ramirez geared toward children originally published in April 2020. These uploads were on the same day US Chess released a statement determining their conduct related to Ramirez was “timely and appropriate.” Both magazines are available in all 50 states including New Jersey.



31. US Chess Master Tyrell Harriott (hereinafter “Harriott”) was first reported for violations of the Safe Play policy in October 2023. He was permanently banned from US Chess in April 2024 but there is no further information available. Between the first report and his permanent ban, he played two tournaments in New Jersey, including the US Chess National Event, the US Amateur Team East potentially exposing innocent players to danger.

32. New Jersey resident and party Defendant Tamburro is the current New Jersey Chess Federation President and one of four current New Jersey Delegates to the US Chess Federation. In February 2024, Tamburro wrote and published an article in American Chess Magazine, a New Jersey publication that was broadcast through the internet worldwide, that was defamatory, libelous and placed Plaintiff Shahade in a false light invading her privacy. And yet, Defendant US Chess named

him as a delegate after the publication that then was adopted by US Chess by publication on its website that was retaliatory, defamatory, and placed plaintiff Shahade in a false light.

ADDITIONAL STATEMENTS OF FACT

33. All the above facts about Defendants' contacts with the State of New Jersey form the basis for Jurisdiction and Venue and are adopted herein as though set forth at length in full.

34. Plaintiff Jennifer Shahade,



is a life member of US Chess, two (2) time National Women's Chess Champion, Team USA Chess Olympic Silver Medalist (2004), and has been a Chess Grand Master since 2005. She is also the victim of several sexual assaults by a Chess Grand Master and assault and battery by other US Chess Sanctioned players. In August 2011 and in March 2014 Shahade was physically and sexually assaulted by Grand Master Alejandro Ramirez. In February 2023, Plaintiff publicly tweeted his name, but no punitive action had been taken against him sufficient to prevent him from having contact with other potential victims including children.

**Post****Jennifer Shahade**
@JenShahade

Time's up.

Currently there are multiple investigations underway on Alejandro Ramirez and sexual misconduct, including a series of alleged incidents involving a minor. I was assaulted by him twice, 9 and 10 years ago. I'd moved on until the past couple years, when multiple women, independent of each other and with no knowledge of my own experience—approached me with their own stories of alleged abuse. These accounts were from much younger alleged victims. I saw alarming evidence, including texts that admitted abuse of a minor while he was coaching her, as well as a text to an alleged victim about being an underage "temptress."

The road to investigation and potential consequences has been a very stressful process. You may have noticed I've taken a major step back from commentary as his plays out. I've filled the time with poker, writing and promoting girls in chess and yet a lot of that work to make chess more inclusive is futile if we cannot make crystal clear that the safety of women, girls, children is of the highest priority. And that's why I'm speaking out now. Thanks for your support and patience for more details. 🙏

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35. She became a public whistleblower about the numerous sexual abusers that US Chess allowed to be around in an arena to sex traffic child chess players in an environment that condoned and encouraged this conduct, failed to promptly protect the most vulnerable from predatory gender violence, sexual assault and predatory behavior.

36. Shahade followed up with US Chess because of its failure to take timely and appropriate action including pleading with the women's committee.

37. On July 11, 2023, Shahade wrote an e-mail reminding the Executive Director of her many warnings about Ramirez and asked US Chess to revise the statement that they reacted appropriately to her concerns. She offered to go over a detailed timeline with the Executive Board and additionally asked them to clarify support of her whistleblowing efforts. "I got a critical letter from US Chess counsel (about my tweet). But in fact, my whistleblowing was the correct action. US Chess leadership should clarify that my tweet was timely and appropriate, considering that Alejandro was slated to be on a chess team with two teenaged girls that same week...he was promptly removed after my tweet."

38. Then when the cover-up continued that there were other victims, she continued her pleas on social media because the ban of Ramirez that came was years later than it should have. Shahade was not the only one to point this out. Another woman with allegations about Ramirez said:

Another woman whose allegations about Ramirez were reported to US Chess also challenges the finding:

"I do not agree that US Chess was "timely and appropriate" in regards to reports about Ramirez's conduct. I submitted the Safe Play Complaint form with details of sexual abuse prior to an event I was attending where I knew [Ramirez] would be present. The receipt of my report was immediately acknowledged. However, I was not informed of an investigation until a month after my official report and after the event had passed. No effort was made by US Chess to ensure my safety during the event, where several US Chess officials and representatives were present. After my interview, I was told that the information would be reviewed at the next board meeting, and I would be informed of the results. I never heard back. During this time, Ramirez was allowed to participate in US Chess events and coach various female-only teams. Only when Jennifer Shahade raised the issue publicly several months later did anything concrete happen."

39. And with no whistleblower policy in place, and no effective hostile gender violence policy in place, and as a result of being a whistleblower, Shahade has been retaliated against with

continued campaigns including one inseminated from New Jersey to gender attack her and discriminate against her both in New Jersey and nationwide, forcing her first to lose her livelihood by being constructively discharged first in her position at US Chess, and then damaging her credibility and reputation in order that the public would spit upon and disbelieve her allegations. And then when she continued to speak out as a result of a social media campaign organized in part by Defendants to lessen the credibility of Shahade regarding her complaints of failures to guard the safety of chess players, especially children and promote the alleged failures of US Chess, US Chess conspired with others to put Shahade in a false light and defame her with individuals US Chess had either a duty to control or by instigating and fomenting a public relations campaign against her that started in New Jersey and continue on its national publication website. As a result of this worship of the male Grand Masters over the vulnerable, and the worship of the monetary big-name donors over the victimized, US Chess enabled the sexual assault on victim Shahade and others in the first instances, then later her employability, stature in the chess community and worldwide her reputation.

40. After Shahade informed US Chess that her employment with the organization had become untenable, US Chess had its lawyers threaten her with legal action falsely accusing her of improperly obtaining its members' personal e-mails. In fact, the Board members consistently used its members personal e-mails and phones. (As part of the litigation preservation notice Shahade, through her counsel, have asked that all personal e-mail accounts and phones of the Executive Directors and Board members be kept without deletion.) In fact, this *confidentiality* policy was started in order to prevent, conceal, and protect the sexual predators among US Chess and prevent victims from learning about them and each other. By enveloping itself in a predator protection program though fundraising as an educational 501(c)3 entity, US Chess and its agents committed a

predicate act under New Jersey Civil RICO. Indeed, US Chess in concert with its named co-Defendants sought to protect US Chess by attacking Shahade.

41. When US Chess thought Shahade was beaten into submission, Defendant US Chess attempted to force Shahade in a sham mediation. Its' then-Interim Executive Director, a former lawyer for a Fortune 500 company, first offered to mediate with Shahade without an attorney, with a jurist it handpicked and set up dates to have the sham mediation, in its own back yard, Missouri, in order to silence her (upon information also hoodwinking the proposed jurist by failing to reveal the full story). When Shahade finally obtained legal counsel, Defendants failed to honor its offer to mediate because it never had any intention of having a real mediation to make Shahade whole but instead to further victimize her into signing a non-disparagement agreement and NDA without, in exchange, making her whole and compensating her. This action seeks to put a stop to the willful, wanton, reckless, intentional and gross conduct against Shahade and restore her public self-worth and her reputation in hopes that in the future US Chess will right itself by finally and appropriately responding to her victimization and in the process cease and desists its failure to promptly remedy and remediate its conduct that enabled women and minors to be assaulted.

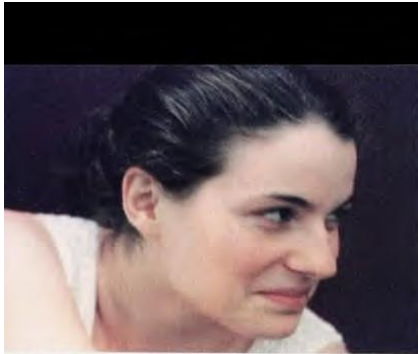
42. Shahade has been a member of US Chess since at least 1990 when she was a minor female child of the tender age of just nine years old. Shahade has spent her life promoting and sharing her love of the game of chess with a focus on minor females and women's empowerment. Her father and brother are Chess Masters and Pennsylvania champions.



The Philadelphia Inquirer / SHARON J. WOHLMUTH

Like father, like son. Like daughter, too. Four-time Pennsylvania State chess champion Mike Shahade of Center City stands behind a couple of new state chess champs — his son, Gregory, 12, and his daughter, Jennifer, 10, who won Pennsylvania state titles for junior high school boys and girls in the same tournament. They are students at the Greenfield School in Center City.

43. At 17 years old, she became the first female to ever win the U.S. Junior Open in its then-53-year history.



Jennifer Shahade

photo by Bill Hook

by Karl Heck

In the middle of July, at one end of Cayuga Lake in Seneca Falls in upstate New York, 150 years of women's rights history was being celebrated. At the other end, in Ithaca, **Jennifer Shahade** was writing a new chapter in the history books.

The 17-year-old Shahade became the first woman ever to win the U.S. Junior Open in its 53-year history, on July 19 in Ithaca, New York, by scoring $5\frac{1}{2}-\frac{1}{2}$ in the tournament's Open section. Shahade (2200), the tournament's highest-rated player, won her title the hard way, by facing four of the top five players below her in the standings. Only Rochester, N.Y. expert Joseph McDougall (2037) was able to hold her to a draw in Round 5.

Just getting to the event and participating was difficult for Shahade. Her schedule include arriving from New York City (where her brother was playing in the Interplay U.S. Junior Invitational) around midnight after a five-hour bus ride, finding a hotel room and getting to the tournament site at Ithaca College in time to register for the first round. Immediately after the event, Shahade reversed the schedule, with a 6:45 p.m. bus back to New York (her tournament ended about 6:15 p.m!), and then to Philadelphia to catch a 6:30 a.m. flight to Hawaii for the U.S. Masters and U.S. Open. What a trip!

Along with the Junior Open title, Shahade became the first woman ever to qualify for the U.S. Junior Invitational with her victory. She will be one of the ten participants in next year's U.S. Junior. with her victory. She will be one of the ten participants in next year's U.S. Junior.

44. Shahade became a two-time U.S. Women's Chess Champion and Woman's Grand Master. This photo represents Shahade on her way to her first title.



45. Shahade was approached by Tamburro for a cover story interview in September 2023 after she was constructively discharged by US Chess. Shahade refused after receiving his questions – which included one on *why she didn't punch Alejandro Ramirez when he attacked her*. And he crowed that he “*taught sexual harassment.*” And he taught “*the victim had a duty to tell the harasser to stop harassing her before a complaint could be filed.*” It was clear that it was not in her best mental health interest to speak to him as his idea of a victim’s response to a sexual assault was left back in the Neanderthal days.

*"When I was teaching sexual harassment to other teachers and students, one of the rules was that if someone feels a comment or action was inappropriate, **they had a duty to inform that person. Then, if it was repeated, a sexual harassment complaint could be filed.** It seems to be missing in the Conduct document. Here are two possible conversations: Male: “Wow, you are very beautiful. I don’t know how I’ll be able to concentrate during the game looking at you.” Female Response 1: “Excuse me, I’m going to the TD before we start.” Female Response 2 “That is an inappropriate and unwelcomed comment. We are here to play chess. Please don’t stare at me during the game.” Which route do you favor and why?"*

46. US Chess was on notice that Peter Tamburro, a two-time Chess Journalist of the Year, US Chess Delegate and NJ Chess Federation President, would be biased against protecting children and women from sexual assault. Instead, US Chess’s praises him.

"We appreciate Mr. Tamburro’s work in doing the deep research and fact-checking responsible journalism requires"

"We are grateful to Mr. Tamburro for having asked the hard questions, learned the facts and set the record straight."

"We join him in urging the chess community to avoid the temptation to buy into unsubstantiated rumors."

<https://new.uschess.org/news/us-chess-executive-board-statement-about-american-chess-magazine-article-due-process-part-ii>

47. In 2021, Tamburro started a blog <https://www.tamburro.org/pjt/> which is found at through an election denier Facebook page and cagey concealment not findable by Google

incorporated herein as though set forth at length in full titled each day—" Day "X" of the Usurper"

he:

a. He advises high school girls who are considering sex to have some "self-respect." He mocks Disney for addressing concerns about a non-consensual kiss and calls high school girls "cutie pie freshmen." **Tamburro reveals that as a NJ school teacher, he was informed multiple times about parties where junior high school students performed group oral sex**, but Tamburro turns it into a graphic punchline, failing to give any updates on whether or how he reported it. Tamburro was a New Jersey teacher for 40 years, starting in the Morris School district, then to Hanover Park High School in New Jersey, and ending in Frisch School in Paramus, New Jersey.

Screenshots from Tamburro's commentary on sexual assault, abuse and girls:

increase in "locker room" discussions about oral sex. I recall several of my students, both boys and girls, telling of "rainbow parties" their younger siblings were having, where each girl would wear a different color lipstick and the goal of the game was to create a rainbow on the excited boys' excited male organ before the end of the evening. Just a harmless eighth grade party—no booze, no drugs: parents were confident of that.

You have to start early, especially with girls. They are a target. If you have a cutie pie freshman or sophomore, the senior males are like predators, and the attention they give young girls who want to feel "special" is a nasty mix. Read again the results of that poll I took.

b. Regarding two prominent female elected officials he uses a sexist term of "**bitch slap**." Tamburro says he wants to "**bitch-slap**" multiple Congresspeople including AOC and Pelosi. He elaborates to quite a few people that he would love to give one hell of a bitch-slap to Congresswoman Nancy Pelosi.

Screenshots from Tamburro's comments on "bitch-slapping Pelosi"

fabric. Quite a few people have suggested they would love an opportunity to punch Schumer, Nadler, Schiff in the nose and give one hell of a bitch slap to Pelosi, wipe the smile off Omar's face, etc.

Every time a Pelosi or Schumer or AOC or Schiff or Obama or any of those clown that appear before a mike get up there and LIE, EXAGGERATE, PRESENT EMOTION FILLED HATRED and get away with it by a compliant press, I just want to bitch slap every one of them. Thank

c. Tamburro says homosexuality should be re-considered as a disease and blames activist "bullies" for pushing that idea aside. He advises not to give "a thought to all the trans screams. The more they scream, the better we do."

Screenshot from Tamburro's commentary on LGBTQ+ issues:

However, in 1970, homosexual activist physically stormed the APA conference in San Francisco and shouted and screamed and completely disrupted the meeting. The APA had to hire security for later meetings, but they kept coming. Miracle of miracles the social "scientists" determined that homosexuality was no longer a mental illness. Was there some new result of studies? No, they were bullied into changing their professional stance a short time later. The lesson was not lost on other groups. You can argue the nature/nurture reasons for homosexuality. It might even be a combination of the two. The bottom line is that social "science" (always a pretentious term in my opinion) has no way of finding out. The difficulty in this little history is that rather than act rationally, the activists decided to bully people into accepting their viewpoint.

d. Referring to VP Kamala Harris, Tamburro invents a fictional conversation on why she was selected: "pick the minority woman Harris. We know she'll do anything to get a-head." Tamburro compares liberal welfare programs to the KKK and asks, "if black lives matter, why don't you as a community take responsibility for the sorry state of affairs in your own black community?" He compares Black Lives Matter to Nazis. Tamburro also writes, "After listening to some black interviewees... No higher order thinking skills were apparent." He says black athletes should not protest and instead "get down on both knees and thank God for what that flag represents." He calls black liberals "permanent members" of a plantation and mocks black people for coming up with alternatives to "Negro." He calls Jewish democrats "idiots."

Screenshots of Tamburro's commentaries on VP Kamala Harris and black and Jewish communities:

We'll place the handlers like Rice in the White House. The press will do what we want. We can't let this get away from us again. And, oh yeah, pick the minority woman Harris. We know she'll do anything to get a-head (general laughter)."

Well, “black community” of which we have heard so much, if black lives matter, why don’t you as a community take responsibility for the sorry state of affairs in your own black community. Blaming white people in general for destroying black lives just perpetuates resentment and ingrains in black community members a resigned sort of attitude that there isn’t anything you can do about it because whitey won’t let you, unless, of course, a bunch of white politicians increase your benefits to keep you wallowing in your dependency.

Blacks have been sold a narrative that has made them permanent members of the liberal plantation. Some are realizing it and revolting at the cost of being called Uncle Toms and sell-

Why then, despite their enormously disproportionate contributions to the advancement of all of mankind, is there this deep seated, thinly disguised hatred of whites in general, poisoning the air?

further pressure on our only real ally in the Middle East. If you’re Jewish and you voted for Biden or the Dems, you’re an idiot. The rabbis in the yeshiva I taught in called those Jews “self-hating Jews.” I prefer “idiots.”

They are all aiming for the hearts and souls of the people. We have to do that and aim at their brains as well. After listening to some black interviewees in Minnesota, that last part is going to be quite a challenge. No higher order thinking skills were apparent there.

48. Shahade's lifelong goals of providing a safe space in chess for girls, women, the LGBTQ+ community and people of color were trampled on by choosing Tamburro as the writer to leak her and other victims' private information to and to conspire with US Chess to retaliate against her with this actionable article. This was the most damaging choice possible to Shahade's mental health and Shahade's hopes for a better US Chess.

49. Despite the above, the US Chess accolades for Tamburro are numerous. He won a Special Service Award from US Chess in 2021 and a Chess Journalist's award for an interview with

former US Chess Executive Director Carol Meyer. He appeared in April 2024, months after his retaliatory article, at a gala that promoted women's chess with US Chess board members including the new US Chess Executive Director.



50. Shahade's achievements in chess as a female were recognized.



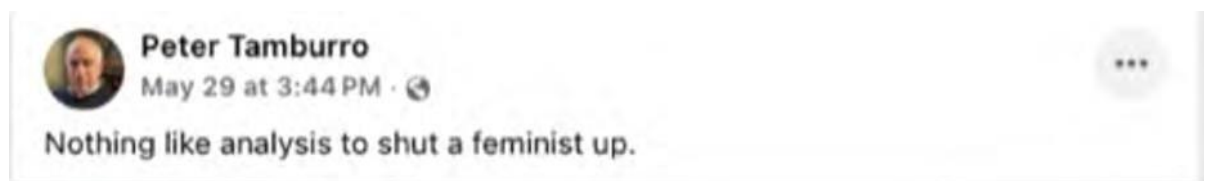
51. Her bio is impeccable:

Jennifer Shahade is a two-time U.S. Women's Chess Champion and the author of CHESS QUEENS, PLAY LIKE A GIRL, PLAY LIKE A CHAMPION and the forthcoming THINKING SIDEWAYS. Her writing has appeared in the Wall Street Journal, the Financial Times and MSNBC. She has held the Women's Grand Master title since 2005 and is the first female ever to win the U.S. Junior Open. Shahade is a PokerStars Ambassador, a two-time Global Poker Award winner, co-founder of 9Queens, a board member of the World Chess Hall of Fame and an advisor to the Women in Chess Foundation. She has coached and mentored thousands of children through her advocacy work in chess.

52. Unfortunately, Shahade's love of chess and her firm belief in the original mission of US Chess to bring children, young girls and women into an intellectually powerful game as a means of their empowerment, resulted in her becoming a victim of Sexual Assaults.

53. The sexual assaults will not be recounted in full in this Complaint publicly, but only parts that show the depth of retaliation by Defendants and uncharged RICO co-conspirators that form predicate acts – but Defendants are fully aware of same. Victimization can occur to anyone. Sexual Assault/Gender Violence can happen to anyone. Shahade was sexually assaulted in Florida and Missouri by Chess Grand Master Alejandro Ramirez, who was also a member and contractor/agent of US Chess, and who was lauded by US Chess as recently as February 2023, well after US Chess received detailed complaints about his alleged assaults against underage players. Shahade synopsisized the crux one of the assaults she suffered to a US Chess investigator in writing on February 22, 2023: “He unexpectedly attacked me, pushed me against the bed and attempted to forcibly kiss me and press himself against me in a sexual way.”

54. However, US Chess in concert with a writer and chess delegate and another member of US Chess in concert conspired to retaliate against Shahade in an article written in American Chess Magazine by defendant Peter Tamburro whose Public Facebook profile crows “Nothing like analysis to shut a feminist up.”



55. The above-mentioned article will be discussed further below. However, in Tamburro's retaliatory piece against Shahade, her assault was minimized and mocked, alluded to as “He forcibly

kissed me the second time without my permission” doesn’t quite conjure up the same image that a ‘sexual assault’ does. Along with humiliating Shahade, Tamburro improperly rephrased and minimized her experience, causing Shahade great emotional distress. She found herself recounting what really happened to multiple colleagues and friends to restore her credibility and reputation, causing re-traumatization. This traumatization is significant because research shows past trauma gets embedded in your genes.

See Nat Geo: <https://www.nationalgeographic.com/premium/article/trauma-genes-inherit-epigenetics-methylation>.

56. Tamburro not only minimized Shahade’s allegations in his article, **he also phrased a rape allegation of a teenage US Chess player as “trying to get involved with.”** By minimizing an attempt at sex with a minor, along with minimizing the multiple assault allegations and discrediting Shahade, Tamburro’s article, as endorsed by US Chess front and center on its website, also recklessly jeopardized potential criminal and civil investigations against Ramirez. The publication of this article as adopted US Chess not only is a clear predicate act under RICO but is evidence of the policy of attacking and retaliation against women who have come forward to report abuse to US Chess and its failure to respond quickly to remediate such hostile gender environment and retaliation.

57. It is the chess nobility that makes what has happened to Shahade all the worse. If retaliatory actions can be taken against her for coming forward by the rich and powerful Defendants, no victim, no woman, is safe from the wrath of being a victim whistleblower. However, it is clear that securing donations from powerful people is more important to US Chess than protecting its members. Shahade was employed by US Chess from 2006 until September 2023 when she was constructively discharged on or about August 24, 2023, with her last day of work on September 6, 2023, after coming forward with her complaints. Prior to that, Shahade was employed by US Chess as an Officer

of US Chess and Director of Women's Programs. Shahade complained to US Chess about the aforesaid predatory Grand Master and as a result of the inaction of US Chess and other chess entities, she was forced to come forward publicly as a whistleblower after her complaints were met with retaliation from the powerful US Chess organization which improperly publicly released confidential facts about her assaults. She also suffered further retaliation by members of US Chess and its Board of Directors, including the current Board President Bauer, who engaged with others in a public media campaign utilizing various social media platforms such as X-Twitter and other publications, to blame her, the victim, for not coming forward sooner and falsely claiming she did not report Ramirez on multiple occasions. This retaliation for making complaints about sexual assault, gender discrimination, hostile work environment, inaction to correct sex assault, sex victimization, gender bias, and the like, further fueled a conspiracy to attack her and her reputation was one which attempted to humiliate her publicly by releasing confidential details of her complaints and the complaints of other victims. A copy of the Facebook post is adopted herein.



Randy Bauer

Jennifer Shahade Why didn't you file a formal complaint? If you had, I'm certain this would have been resolved in the way you wanted. You didn't, and my understanding is that you were asked to do so and would not. At some point, if you were so certain about his conduct, and you were one of those he had abused, isn't it on you to step up?

1h Like Reply Edited

58. The actions of US Chess were done in spite of the fact that its 2022 990 tax filing showed Defendant had **NO** written whistleblower policy.

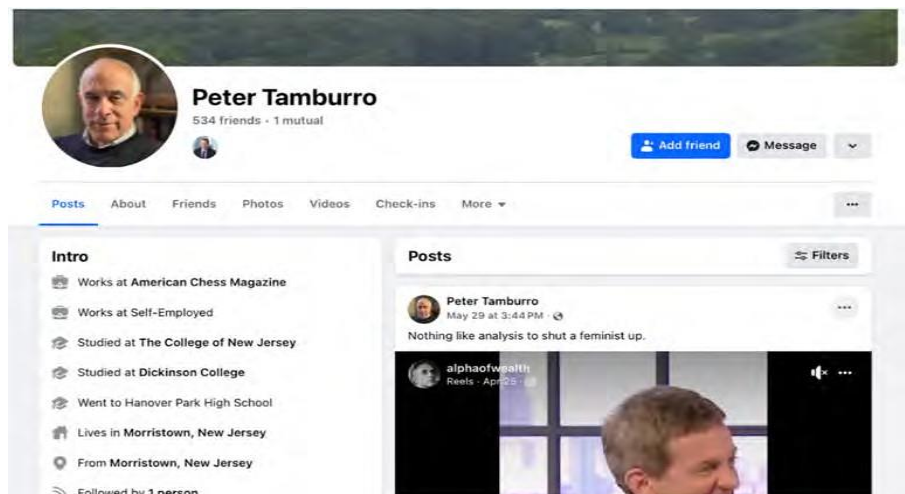
13 Did the organization have a written whistleblower policy?	13	No
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59. US Chess and its agents failed to protect victim Shahade and others, some of whom were minors at the time of the assaults, several of which have now come forward anonymously due to victim Shahade's bravery in coming forward publicly with her complaints despite the retaliatory conduct of US Chess. The article by the Wall Street Journal is adopted herein in full because it led to further stepped-up retaliation to attempt to take plaintiffs rights away in a sham mediation as set forth below. *See* Wall Street Journal, "How Sexual Assault Allegations Against a U.S. Chess Grand Master Went Unaddressed for Years," updated March 7, 2023, in which other victims publicly reveal the failure of US Chess to protect them from sexual assault, gender discrimination, predatory chess players and the like. *See* <https://www.wsj.com/articles/Alejandro-ramirez-jennifer-shahade-chess-allegations-622263b8?>

60. If that was not enough, Defendants conspired to retaliate and did so by allowing, encouraging, soliciting and otherwise causing further retaliation when Defendant, New Jersey resident Tamburro wrote and published an article on Shahade damning her allegations as false, and claiming that US Chess was pristine in how it handled gender harassment, assault, sexual victimization and child molestation and failures to protect women and minors from such predatory conduct. In doing so, US Chess picked someone who had legs in the chess world, as Tamburro holds the 2023 title of Chess Journalist of America and has edited a book by the 13th World Chess Champion Garry Kasparov an icon and global advocate for human rights thus giving the writer

Tamburro the credibility of the association with Kasparov (likely never informing Mr. Kasparov of his election denialism website or intent to retaliate vs. Shahade.)

61. Defendants handpicked and conspired with Tamburro to author and publish a hit piece on Shahade, whose public Facebook page states **“Nothing like analysis to shut a feminist up.”**



62. Tamburro’s article, fully adopted by US Chess, is also filled with at the very least discriminatory Cognitive Bias specifically implicit bias or implicit stereotype bias against a female survivor whistleblower, making this publication discriminatory based on gender, and/or retaliatory based on gender and/or in part or in full motivated by discriminatory intent or motivated to retaliate against a female whistleblower.

63. In fact, US Chess continues to further retaliate against victim Shahade. As just one example, it re-published on its **nationally distributed** webpage on or about February 15, 2024, <https://new.uschess.org/news/us-chess-executive-board-statement-about-american-chess-magazine-article-due-process-part-ii> where they adopted a derogatory and factually false article originally published in New Jersey, https://new.uschess.org/sites/default/files/media/documents/acm_037-pete-due-process-ii-final.pdf applauding its alleged responsiveness to the reported vile conduct and

further retaliating against and publicly attacking victim Shahade causing damage to her professional reputation and causing her emotional distress.

64. The article as adopted downplayed Shahade's complaints. As a payoff, Defendant US Chess rewarded Tamburro with support for his delegate status. During this time US Chess continued to collect donations under a fraudulent banner to further its stated tax exemption purpose set forth hereunder in this complaint. But in their quest to diminish Shahade, US Chess failed to realize the existence of New Jersey protections of retaliation for such grotesque conduct. US Chess only moved it to the back of its nationally published webpage when Shahade engaged legal representation but never removed it or retracted any of its

falsehoods or victim-blaming statements, many of which were pointed out by concerned members on social media platforms X/Twitter and Facebook. The article had never been fact checked with Shahade or any other victim. The downplay of the child molestation complaint made by Shahade to US Chess was an intentional falsehood. Shahade's actual e-mail to US chess said: **"a US Chess female member alleged...severe abuse / molestation by him starting when she was underage...She was the one (Shahade) reported to (US Chess in January 2021)."** US Chess, in



their endorsement of Tamburro’s piece, intentionally changed Shahade’s words, from “severe abuse and molestation” to “harassed,” “underage” to “women” and “reported to you ” and to “rumors.”

65. Further intentional mistakes and reckless errors in the article that damage Shahade, include but are not limited to:

- US Chess’s endorsement of the article writes “Shahade said in an email” but then changes Shahade’s written words from **“severe abuse and molestation”** to **“possibly having harassed,” “underage”** to **“women”** and **“reported to you”** to **“rumors”** in a brazen attempt to minimize sexual assault allegations and discredit Shahade.

- The article incorrectly gets **the date, location and organization** of the Pan-Am Championship wrong. The Pan Ams is a US chess National event that Alejandro attended in Seattle, Jan 2023 as a women’s chess coach for Saint Louis University—the article states the Pan-Ams were in Mexico, in December 2022 and that US Chess had no jurisdiction over it.

- The article includes the incorrect premise that Chess.com broke “off relations with US Chess.” Chess.com never acted against or banned US Chess. The article also implies that Shahade’s “accusations” incited such fictional action. This casts Shahade in a false light as an instigator.

- The article incorrectly assumes that Greg Shahade hired Alejandro to work at a chess camp in Saint Louis in 2016. At this camp, Alejandro stopped by as an employee of the STL Chess Club. He was not hired nor enlisted at the camp by Greg Shahade.

- The article incorrectly implies that Greg Shahade knew that his sister Jennifer Shahade was assaulted by Ramirez in 2016. In reality, Jennifer Shahade first told her brother Greg Shahade in 2021, soon after Jennifer and Greg Shahade learned of an allegation of Ramirez’s misconduct against another female player.

- The article refers to Jennifer Shahade as “Jennifer” throughout the article (25 times), despite her barely knowing Pete Tamburro. Alejandro Ramirez, by contrast, is referred to “Ramirez” throughout the article.

- The article incorrectly implies that an MLB player (Trevor Bauer) was exonerated of all wrong-doing when he received the longest suspension due to domestic violence and sexual assault in MLB history.

- The article says the Wall Street Journal article “How Assault Allegations Against a Prominent Grandmaster Went Unaddressed for Years” came out “days after Shahade’s (Feb 15) tweet” when it came three weeks after Shahade’s tweet.

- The article incorrectly states that Shahade had forgiven Ramirez when she spoke to him on the phone to ask him to step down from calling the US Junior Girls Closed (Fall 2020.) Shahade clearly explains in the statement that was leaked to Tamburro that she revoked forgiveness (of Alejandro) “in the Summer of 2020” when she heard about other allegations. This retaliatory falsehood intentionally undermines the severity of Shahade’s concerns.

- The article claims the number of times Shahade informed US Chess about Ramirez is “disputed” but she has records of warning them on June 2020, January 17, 2021, January 22, 2021, December 2021 and Summer 2022, before legal representation took over. This doesn’t include shorter conversations when Shahade was brushed off. No one ever disputed these facts with Shahade.

- The endorsement on the US Chess website says Shahade’s first notification to US Chess about misconduct allegations and Ramirez was in “late 2020” when it was June 23, 2020. June is not “late 2020.”

- The article claims there were no records of Greg Shahade contacting US Chess in 2021 about Ramirez. The Wall Street Journal confirmed seeing communications between Greg Shahade and US Chess. A lawyer for US Chess also confirmed contact, writing in an e-mail to Jennifer Shahade, “Others I have interviewed have recalled that, with respect to US Chess (and Greg Shahade), there was a conversation (about Ramirez)”

- The article and the endorsement minimize Shahade’s warnings, falsely claiming that they were all vague. It fails to explain why in 2020, US Chess banned Ramirez from “any capacity where he would come into contact with minors” if all warnings from Shahade (and others) were so vague. The article further minimizes Shahade’s tireless role in communicating with victims, media, law enforcement and warning other chess entities, to provide info about Ramirez.

- The article both leaks AND mischaracterizes Shahade’s assaults: “*He forcibly kissed me the second time without my permission*” *doesn’t quite conjure up the same image that ‘sexual assault’ does.*” Shahade’s description in an e-mail to the US Chess investigator: “He unexpectedly attacked me, pushed me against the bed and attempted to forcibly kiss me and press himself against me in a sexual way.”

- The article and endorsement imply US Chess hadn’t heard warnings about Ramirez prior to 2020, despite reporting by the Wall Street Journal to the contrary. US Chess themselves leave the possibility open in a statement: “**US Chess has no record of**” any Ramirez allegations prior to 2020. A reddit thread by a former US Chess board

member writes: “The recent US Chess announcement where they deny all knowledge of Ramirez's situation is false - they did know and were made aware. Unfortunately, the person who knows this is false cannot prove it **because it was brought up to the US Chess Board in a ‘closed session’ which meant there is no record of it being brought up... I believe they were aware of the situation far longer than they are admitting....(That the) players are grandmasters plays a huge role in the chess powers-that-be looking the other way.”** See: https://www.reddit.com/r/LouisvilleChess/comments/12hhe8b/a_reddit_user_asked_the_following_question_wi_th/

- The article questions how Shahade’s tweet caused “concrete action”, despite Ramirez immediately being removed from a team with teen girls, an organization being founded due to Shahade’s work (Women in Chess Foundation), seven more women coming forward to media on this case (and many to law enforcement), and many other women (and a man) acting on different cases, many explicitly mentioning Shahade’s tweet/work. The STL Chess Club thanked Shahade for her “relentless work” before rolling out a slate of anti-abuse and anti-retaliation policies. Shahade was distressed by the article’s retaliatory attempts to minimize her role in making the chess world safer for girls, women and children.

- The endorsement incorrectly states Shahade was “consistently urged” to report more details and that US Chess “expressed sympathy.” She was not consistently urged, and she did not find the response sympathetic. One e-mail from US Chess to Shahade, advised: “The potential ramifications are serious and without evidence, claims are difficult to 'win' Unfortunately, that is where we are... Anything we bring forward, needs to be solid, otherwise, we risk victimizing people all over again... we (US Chess) are not well-equipped to deal with these things”

- The article claims Shahade excoriated Carol Meyer, but Shahade did not criticize her by name or title in her cover story, her resignation letter, or any newspaper or magazine article. These mischaracterizations place Shahade in a false light as a bully.

- The article states US Chess did not interfere with the process of tapping Ramirez to coach the woman Olympiad team by explaining the women voted for him but omits that US Chess paid / appointed / contracted him and promoted his appointment on their website and magazine. It omits that US Chess hired Ramirez for freelance work as late as February 2023 while also promoting him in the magazine January 2023, the podcast in September 2022 and allowing him to play a US Chess National Event with minors in November 2022, and coach a women’s team at a US Chess National Event in January 2023.

- The article expresses that if someone has grand-daughters and daughters they cannot be insensitive to women’s issues.

- The article questions how a woman can get assaulted by the same person twice when it is well known that it takes a woman an average of [seven times to leave or confront her abuser](#).
- The article minimizes an alleged rape of a teenager by phrasing an alleged rape as “trying to get involved with.”
- The article calls Ramirez’s attacks/assaults against Shahade “advances.”
- The article falsely claims that Shahade copy/pasted e-mails from a US Chess database in her last minutes of work. Shahade used an existing e-mail list (that she had used for years without any criticism) to compose a goodbye e-mail, after which she sent the list to US Chess and then deleted the list.
- The article mischaracterizes the original cease and desist that US Chess sent Shahade, which falsely claimed Shahade’s goodbye e-mail was written **the day after** her employment.
- The article, the endorsement, and social media follow-ups by US Chess officials improperly leaked sensitive details of Shahade’s reports (and those of other victims) in an act of retaliation. US Chess does not follow their own policies: “US Chess will consider any form of Retaliation to be a violation of the Guidelines and the US Chess Code of Ethics.” And “Under the Safe Play Policy, third-party reporters' names and contact information are kept confidential” [Safe Play Misconduct Report Form \(google.com\)](#)

66. Even worse it talked about the attempted molestation and alleged rape of a child is if the molester was taking her to a school dance: “Ramirez had tried to become involved with a 15-year-old girl at a chess camp, and later with another one alone to celebrate in a hotel room at a World Youth event.”

67. Luring a child victim is not consensual.

68. This is what US Chess endorsed.

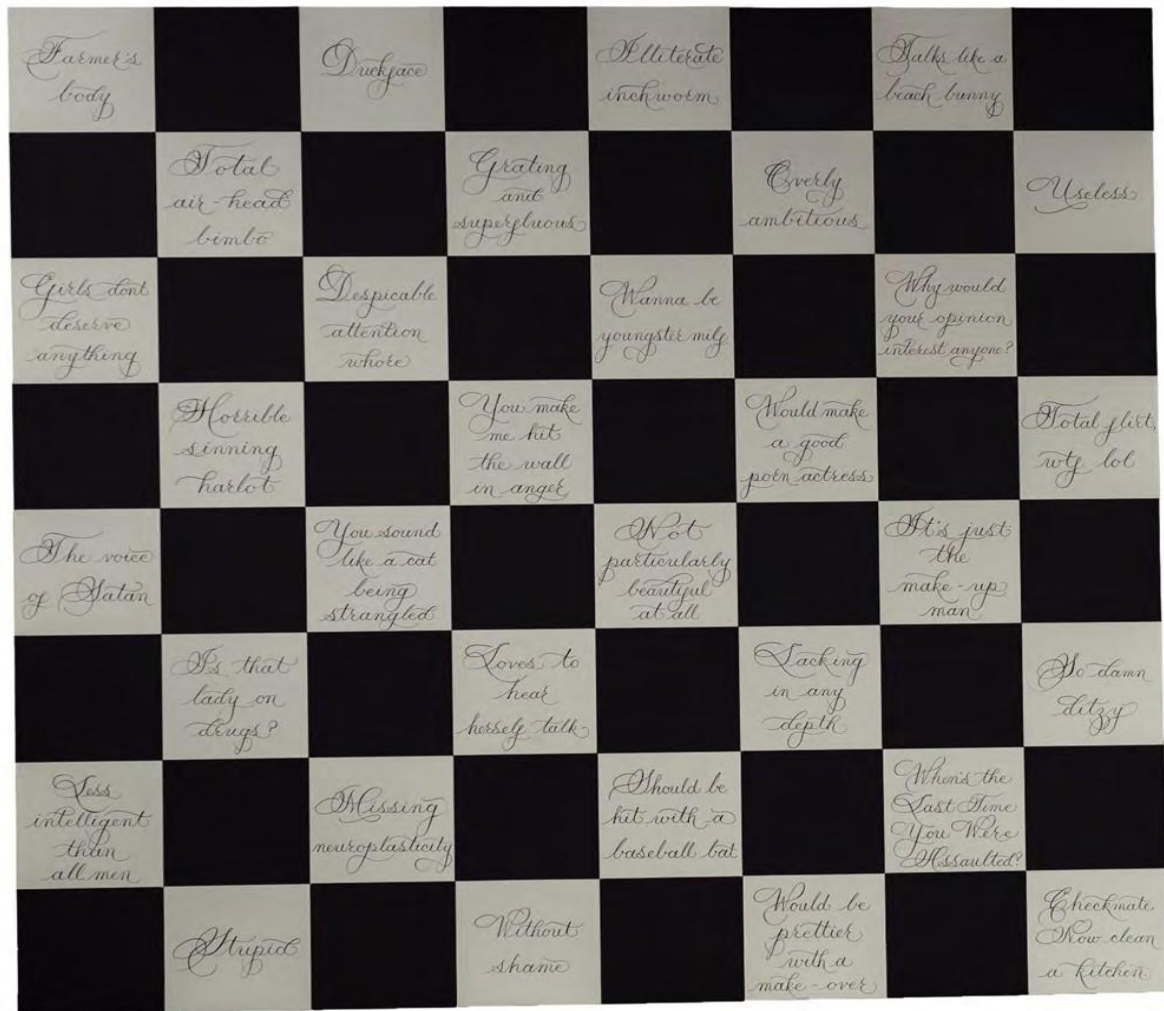
69. With such a horrifying article, it is no wonder US Chess attempted to lure Shahade into a phony mediation to silence her.

70. This pattern of minimizing or ignoring Shahade’s concerns was not isolated to the Ramirez case. Even death and rape threats were consistently ignored. **In August 2010, Shahade**

informed the then-Executive Director that she received a death threat from a US Chess member, but she never received even a reply to her complaint.

71. In 2012, a US Chess staff member tried to help facilitate a meeting with Shahade and a man who had recently been released for jail for the pre-meditated attempted murder of his stepmother, brother and sister. This member had recently moved to the same city as Shahade, Philadelphia. Shahade explained that she had received troubling, stalkerish messages from this US Chess member. These troubling messages also implicated Shahade's beloved mother, Sally Solomon, who also lived in Philadelphia and has since passed. US Chess did not address Shahade's concerns about the member.

72. Any complaint by Shahade further cemented US Chess' view of her whistleblower status concerning the pervasive hostile environment in US Chess. It is clearly demonstrated by this art chess piece *Not Particularly Beautiful*, by Shahade.



73. In October 2018, Shahade notified several members of the US Chess Board, the Executive Director and the US Women's committee about this new art piece which exposed abuse and trolling against women players. It was an enlarged chess board that showed insults she and other top women players received on YouTube, Twitter, email and other platforms. Some of the comments directed to Shahade included "Should Be Hit with a Baseball Bat," "You Sound Like a Cat Being Strangled," and "You Make Me Hit the Wall in Anger." Even though Shahade's work was featured in established art galleries, as well as on NPR and Slate, it was mocked or ignored by US Chess. Former board member Anjelina Belakovskaia wrote, "I am not sure why the Chess Board should be used for feminist statements and #MeToo type of expressions. (The writing) bastardizes the chess

board and chess game and brings in negative emotions and division, instead of focusing on the benefits of chess game and all the positive aspects associated with it. Whoever came up with that idea, might be creative, but did it to promote his/her own political agenda / stance and not to benefit chess, in my opinion.” There were no other replies showing support for changing the hostile environment under the control of US Chess.

74. In July 2023, Shahade advised US Chess of other death and rape threats she had received after her whistleblowing. Again, she received no reply or acknowledgment.

75. On June 6, 2022, Shahade sent an e-mail to US Chess that she was personally attacked by Alejandro Ramirez. In this e-mail she reminded US Chess of the credible allegations of "severe abuse and molestation" against an "underage" victim who Shahade first reported one and one-half years prior, insisting this should disqualify him from work with girls and women. Shahade was retaliated against for her dedication to keeping children safe. On June 17, just over a week after her Ramirez e-mail, Shahade was criticized for posting feminist views on her personal channels by then-Executive Director Carol Meyer. Meyer questioned Shahade for posting about abortion and LGBTQ+ rights on her personal social media channels, informing Shahade that Meyer had received multiple complaints about it. This was the first time in Shahade's 15+ years working for US Chess that she had been criticized for advocacy on her personal channels.

76. Concerned about further retaliation from Executive Director Meyer, Shahade asked if she could report details to someone besides Meyer about her own assaults, naming two members of the US Chess staff with whom she had more favorable experiences. She was not granted this option and so Shahade's reports were all copied to Meyer, after which she was harshly retaliated against.

77. Jennifer Shahade was enlisted by US Chess as a host of the 2018 US Chess Annual Awards Ceremony on August 4, 2018 (Wisconsin) alongside current Board member Leila D'Aquin. In this ceremony, Jennifer was harassed by one of the awardees, then US Chess Trust president Jim Eade (California), who **demande d a kiss from Shahade after he received his award**. He then humiliated Shahade to the crowd by announcing, "If you stay with your career Jen will give you a little kiss... on the cheek. So keep at it." Despite the entire US Chess Board and delegates being in the audience, US Chess clearly thought this conduct was so appropriate that no remedial action was taken, or effective policies put in place, to prevent this assault from occurring again. The below three snapshots from the video that is posted by US Chess to this day show Shahade's position as the awardee approaches the lectern, then he moves back to avoid a kiss, then her succumbing to the harassment pressure and enduring the kiss. Later in the ceremony, Timur Gareyev "Gareyev" (later banned for multiple safe play complaints received between 2019 and 2023) was given an award for Outstanding Player Performance while Steve Shutt "Shutt" (banned the subsequent year, after 14 boys accused him of sexual misconduct) presented an award. Direct link to the time code with kiss important to note Shahade attempted to pull away.

<https://www.youtube.com/watch?si=bzFFJLAY55mzx3Xs&t=3790&v=AXb3xboptwQ&feature=youtu.be>





78. While Shahade was being objectified, humiliated, and retaliated against, Ramirez was being aggrandized. Ramirez continued to interact with girls and women at US Chess or US Chess adjacent events even AFTER US Chess vowed to “stopped engaging (with) Mr. Ramirez in any

capacity where he would come into contact with minors” in 2020, and also after the “formal complaints” from Shahade and another accuser in September 2022.

- In July 2022, Ramirez attended the World Chess Olympiad as Women’s team coach. US Chess contracted, paid and promoted this appointment. Over 100 minors attended this event.

- In September 2022, Ramirez was the emcee for the opening ceremony of one of the most famous tournaments in history, a Grand Chess Tour event. The entire US Chess staff attended.

- In September 2022, Ramirez was featured on US Chess’s One Move at a Time Podcast.

- In October 2022, Ramirez attended the Opening and Closing Ceremonies of the US Chess and US Women’s Chess Championships. At the closing ceremony, he was both dancing and playing chess with women and minor girls.

- In November 2022, Ramirez emceed the Kasparov Chess Foundation gala, where many chess luminaries attended. In November 2022, Ramirez played in a US Chess National Event, the U.S. Masters, where male and female players under the age of 18 participated.

- In December 2022, Ramirez was honored with a round of applause at a Hall of Fame ceremony for the best female player of all time. The entire US Chess board attended. One board member was photographed hugging Ramirez.

- Also, in December 2022, Ramirez takes female students to Mexico for a chess tournament and is pictured in bathing suits with them.

- In January 2023, Ramirez attends the US Chess National Event in Seattle, where he coaches a women’s team. At this event, he connects with US Chess committee members to discuss a future event for women and girls. In January 2023 Ramirez is also mentioned in Chess Life Magazine as women’s team coach and his photo is featured. Link: [2023_01.pdf \(aodhosting.com\)](#)

- In February 2023, Ramirez is hired to write for Chess Life Magazine about the U.S. Masters, despite Shahade specifically advising they pull this. In February 2023, Ramirez announces on his social media that he will be a lead commentator for the Grand Chess Tour.

- In February 2023, Ramirez is announced on a team with other teen girls and women.

• A day after Shahade's whistleblowing tweet, Ramirez sees the first consequences: he is pulled from the team with teen girls and put on administrative leave at Saint Louis University.

79. The United States Chess Federation is incorporated in Illinois and is doing business throughout the United States with their history of corporate offices in Newburgh, New York, New York City, Tennessee and St. Louis, Missouri, along with doing business with various chess affiliate member organizations, not only across the United States but internationally, in various jurisdictions, including but not limited to the countries of Mexico, India, England and many other countries too expansive to list. US Chess claims privileges of a 501(c)(3) corporate status and files Form 990 tax returns annually for Organizations Exempt from Income Tax. From 2018 to 2022 it has donor and other income of over \$13 million and \$6 million in assets for which it gets a benefit from its 501(c)(3) tax exempt status. Upon information and belief there is a donor base from New Jersey.

the organization fails to qualify under the tests listed below, please complete Part II.)

Section A. Public Support						
Calendar year (or fiscal year beginning in) ►	(a) 2018	(b) 2019	(c) 2020	(d) 2021	(e) 2022	(f) Total
1 Gifts, grants, contributions, and membership fees received. (Do not include any "unusual grants.")	2,161,462	2,828,717	2,420,323	2,520,522	3,513,826	13,444,850
2 Gross receipts from admissions						

80. As an organization that maintains donor funds and seeks contributions to support maintaining their assets of over \$6 million, it notes in their tax return that they do not have a written whistleblower policy. Unfortunately, it is using its 501(c)(3) status for improper purposes as set forth in this Complaint. US Chess has allowed at least one Grand Master and teacher under their wing to sexually assault and abuse both women and children. They failed to properly investigate and discipline abusers. They failed to protect victims including women and children. Further, they sponsored and encouraged women and children to partake in chess matches where the abuser was present in a position of authority with this knowledge across the United States and the world which

amounted to human trafficking under federal law a violation of New Jersey Public Policy while knowing of the violence of at least one Grand Master.

81. US Chess touts the fact that “they promote the study and knowledge of the game of chess, for its own sake as an art and for enjoyment, but also as a means for the improvement of society. It informs, educates, and fosters the development of players (professional and amateur) and potential players. It encourages the development of a network of institutions devoted to enhancing the growth of chess, from local clubs to state and regional organizations and it promotes chess in American schools. US Chess is a non-profit educational organization devoted to advancing the role of chess in American society.

82. US Chess promotes the study and knowledge of the game of chess, not just for its own sake as an art, an educational tool and for enjoyment, but also as a means for the improvement of society. US Chess promoted the study and knowledge of chess by educating the public, particularly secondary and elementary age students, about the game, art, science, sport, and discipline of chess. US Chess and its members supported instructional programs in schools; conducted, sponsored, and promoted chess lessons, seminars and lectures; held chess tournaments for youth, adults, and individuals with disabilities; produced publications for its members and others describing the corporation’s activities and promoting chess education; encouraged the formation of chess groups, clubs, and associations; and supported and promoted chess-related activities throughout the United States.” (2022 990 Filing)

83. US Chess failed to properly investigate sexual assault complaints, victimization, predatory behavior and take prompt preventative and curative actions. They failed to inform their donors and players, including parents of minor children players, of such issues because to do so would endanger their 501(c)(3) status that they set forth falsely in its filed report as above to a

government agency. Accordingly, they continued to seek donations and entry fees to contribute money to them as a legitimate business organization and further hired legal counsel to engage in a pattern of conduct devised to conceal these sexual assault allegations from members, donors and potential donors to continue their income stream. Prior legal counsel knew of these complaints and failed to connect victims with authorities. As a result of the above overt acts including allowing children, woman, unprotected victims of all genders to be preyed upon including Plaintiff, US Chess and its agents committed predicate acts involving human trafficking across international lines in furtherance of this civil RICO tax keep it tax exempt delineation.

84. However, as this one person stood up to notify US Chess that she had been sexually assaulted twice and a victim of sexual misconduct by a Grand Master, further helping other victims to come forward and tried to become extremely involved with US Chess to foster, mentor and monitor women's programs so that other women and children would not become victims of such assaults and of the failure of US Chess to recognize and correct its long-standing woefully inadequate policies and its failure to protect its female and minor members from predatory behaviors. As a result of her whistleblowing, however, she was constructively discharged on September 6, 2023, her last day of work, and publicly railed against by the President of the Board Bauer in a public social media posting which stated ***“Jennifer Shahade Why didn't you file a formal complaint? If you had, I'm certain this would have been resolved in the way you wanted. You didn't, and my understanding is that you were asked to do so and would not. At some point, if you were so certain about his conduct, and you were one of those he had abused, isn't it on you to step up?”*** Bauer blamed the victim for not stepping up to the plate sooner and falsely alleged that Shahade had not filed a report. Then, US Chess later retaliated by having its law firm falsify supposed poor work history alleging she had stolen e-mails and falsely claiming she used personal e-mails for US Chess business after her employment,

sending her this notification just before a Jewish holyday. US Chess's false demand letter sought to permanently restrict Shahade's contact with US Chess youth members. This retaliation not only damaged Shahade further: as a confidante for girls and women, Shahade had connected many victims of abuse to reporting channels, including law enforcement.

85. Then in a further retaliatory gut-wrenching turn of events, the Board of Directors instigated and endorsed the publication of a member of US Chess writing an article for a national publication by posting it prominently on the US Chess website. The writer of the article is domiciled in New Jersey. Further, they adopted false and defamatory statements about victim Shahade's complaints which resulted in an invasion of Plaintiff's privacy, placed her in a false light, intentionally caused her infliction of emotional distress and negligently inflicted emotional distress, all while knowing that they did not even have a written whistleblower policy. This conduct, if allowed to continue and be swept under the rug will have a chilling effect on future or past victims of US Chess coming forward to report allegations of sexual misconduct which was allowed to continue unfettered. **The alleged independent investigatory article by Tamburro was intentionally false especially where it downplayed Shahade complaints about child sex victims.**

86. Many of the article's falsehoods intentionally cover up acts by US Chess even when the falsehoods can be uncovered in a matter of seconds via internet search. For example, the article claims that the Pan-American Championships a US Chess National Event held in Seattle in January 2023, was held in Mexico in 2022 and that therefore US Chess had no jurisdiction over it. Ramirez appeared in both location/events and had access to coaching young women in both. In the US Chess National Event in Seattle, Ramirez connected with US Chess committee members to advocate for organizing a new event for women and girls, causing Shahade great distress when she was approached about the idea, and furthering the need for her to become a public whistleblower.

87. All the above actions of US Chess set forth herein also violated Shahade's civil rights to be free from retaliatory discrimination based on gender and whistleblowing. These actions are all based in Intentional Conduct or Gross Negligence, allowing the human trafficking of vulnerable victims for sex, Civil New Jersey RICO, Conspiracy, Fraud, Intentional infliction/gross negligence infliction of emotional distress, retaliation under New Jersey Law Against Discrimination 10:5-1 (hereinafter "NJLAD"), putting Shahade in a false light/invasion of privacy, business libel, causing her damages. And what makes this conduct worse is that Defendants knew Shahade was a sexual assault victim twice over by a chess Grand Master who had become a survivor and had not fallen to the depths of despair that cause many sexual assault victims to die by suicide. The callousness of the actions of Defendant are beyond the pale of decency.

88. This pattern of retaliation, minimizing sexual assault and child abuse sends a chilling message to women and children everywhere who love the game of chess. US Chess's willingness to enlist collaborators, leak, lie and place her in a false light in their retaliatory and relentless rampage against Shahade has badly damaged Shahade's reputation and mental health, intimidating other victims and whistleblowers and even bolstering Ramirez's potential defense with their falsehoods and understatement. All because of her well-documented role in breaking the silence on protecting powerful male abuser predators, which already cost her so much: her jobs at US Chess, countless former friends and colleagues, her reputation, her mental health, and all other damages.

COUNT ONE

**RETALIATION UNDER NEW JERSEY LAW AGAINST
DISCRIMINATION, 10:5-1 *et seq.* (NJLAD)
(APPLICABLE TO ALL DEFENDANTS)**

89. Plaintiff repeats and realleges that facts and allegations in the preceding paragraphs as if set forth at length herein.

90. Defendants retaliated against the Plaintiff in violation of N.J.S.A. 10:5-12(d), in that they took the above retaliatory steps enumerated in this Complaint carried out in New Jersey against a whistleblower under NJLAD.

91. As a result of Defendants' actions set forth above, Plaintiff has suffered damages, including but not limited to mental anguish, emotional pain and suffering, humiliation, stress, anxiety, physical pain and suffering and other physical manifestations of illness.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendants, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess Federation, d/b/a US Chess, Randy Bauer, individually, and in his capacity as Board President, Peter Tamburro, a New Jersey resident, individually, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

COUNT TWO

**GENDER BIAS AND DISCRIMINATION
UNDER NEW JERSEY LAW AGAINST
DISCRIMINATION, 10:5-1 *et seq.* (NJLAD)
(APPLICABLE TO US CHESS)**

92. Plaintiff repeats and realleges each and every allegation contained above in the Summary Statement of the Case and preceding paragraphs as if set forth at full at length herein.

93. At all times hereinafter mentioned, Defendants have permitted a hostile work environment to exist in Plaintiff's workplace which included duties assigned in the State of New Jersey and have subjected her to this hostile environment based upon her gender in violation of the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 *et seq.*

94. Defendants failed to take affirmative steps which are reasonable, appropriate and necessary to ensure that the above-described hostile work environment does not continue, and they failed to ensure that plaintiff's work environment was safe and free of harassment.

95. Defendants have discriminated against her by treating her differently and less favorably from her male counterparts on the basis of her sex which has affected the terms and conditions of her employment.

96. Defendants' actions have persisted over a long period of time from at least two years prior to the filing of this complaint, representing a continuing violation of federal and state law.

97. US Chess and their board members and administrative staff have repeatedly retaliated against victim Shahade for complaining about gender harassment of her and others and for complaining about the hostile environment that US Chess and their Board members and administrative staff allow to be present at US Chess sanctioned events, activities and publications.

98. The acts as set forth above are a part of a continuous pattern of severe and pervasive harassment based upon gender which constitute sexual harassment.

99. All of the foregoing actions of the defendants constitute a pattern of severe and pervasive sexual harassment and thus the Defendants are liable under the New Jersey Law Against Discrimination, N.J.S.A. 10:5-1 *et seq.* manifestation of illness.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendant, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess

Federation, d/b/a US Chess, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

COUNT THREE

**INTENTIONAL AND/OR GROSSLY NEGLIGENT INFLECTION
OF EMOTIONAL DISTRESS
(APPLICABLE TO ALL DEFENDANTS)**

100. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if set forth herein at length.

101. Defendants had notice of the improper, harassing and predatory conduct of numerous Defendants, members and other participants in US Chess sanctioned events and publications and yet, despite such notice which has been detailed herein, failed to take appropriate remedial and cumulative action, including but not limited to, taking appropriate investigatory procedures, effective implementation of their own Safe Play Policy, instituting additional supervision, imposing timely and effective disciplinary actions for improper conduct, protecting of the privacy of whistleblowers and other safeguards.

102. Defendants have acted with reckless disregard for Plaintiff's safety, pain and suffering, and her total mental health being with willful or wanton conduct and with knowledge that injury is likely to or probably will result.

103. As a direct and proximate cause of the Defendants' actions above, Plaintiff has suffered damages including but not limited to mental anguish, emotional pain and suffering, humiliation, stress, anxiety, physical pain and suffering and other physical manifestation of illness. She has further sustained reputational damage due to Defendants' intentional and/or grossly negligent.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendants, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess Federation, d/b/a US Chess, Randy Bauer, individually, and in his capacity as Board President, Peter Tamburro, a New Jersey resident, individually, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

COUNT FOUR

DEFAMATION AND BUSINESS LIBEL **(APPLICABLE TO US CHESS AND PETER TAMBURRO DEFENDANTS)**

104. Plaintiff repeats and realleges each and every allegation contained above in the Summary Statement of the Case and preceding paragraphs as if set forth at full at length herein.

105. In February 2024, Defendant Tamburro, through his US Chess controlled and influenced American Chess Magazine and in concert with the assent of all other Defendants, published an article entitled “*Due Process Part II.*” The article contained numerous statements more particularly identified in the preceding paragraphs that were false, defamatory and put Plaintiff Shahade in a false light. The statements were on their face libelous/defamatory by virtue of the clear deceptive implication that Shahade’s allegations were not worthy of credibility and therefore, were false.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendants, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess Federation, d/b/a US Chess, Randy Bauer, individually, and in his capacity as Board President, Peter Tamburro, a New Jersey resident, individually, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

106. Tamburro's false and defamatory statements were published through the State of New Jersey and around the world in print and on the internet, including the homepage and front internet page of US Chess. Tamburro in concert with Defendants ensured that these false and defamatory statements about Shahade received worldwide circulation by their actions. Tamburro, in concert with Defendants, made these false and defamatory statements knowing they were false or with reckless disregard for their truth or falsity.

107. Tamburro in concert with Defendants made these false statements with ill will and spite and with wonton, reckless and willful disregard for its injurious effects on Shahade and Shahade's rights.

108. Tamburro in concert with his co-Defendants' false and defamatory statements caused Shahade to suffer reputational emotional and professional harm and has injured her standing in the international chess community.

109. As a direct and proximate cause of the Defendants' false and defamatory statements, Plaintiff Shahade has sustained damages that will be proven at the time of trial.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendants, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess Federation, d/b/a US Chess, Peter Tamburro, a New Jersey resident, individually, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

COUNT FIVE

FALSE LIGHT/INVASION OF PRIVACY
(APPLICABLE TO ALL DEFENDANTS)

110. Plaintiff repeats and realleges each and every allegation contained above in the Summary Statement of the Case and Paragraphs 1 through _ as if set forth at full at length herein.

111. Defendants' statements, actions and publications have placed Plaintiff before the public in an objectionable false light or false position by twisting her words, revealing the details of a confidential sexual assault complaint and attempting to discredit her own complaints and her objections to the way that US Chess handled complaints of predatory and inappropriate sexual behavior against both male and female chess players some of whom were children.

112. Defendants' actions as detailed herein have placed her in a false light and injured her standing in the community.

113. As a direct and proximate cause of the Defendants' false light and invasion of privacy, Plaintiff Shahade has sustained damages that will be proven at the time of trial.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendants, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess Federation, d/b/a US Chess, Randy Bauer, individually, and in his capacity as Board President, Peter Tamburro, a New Jersey resident, individually, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

COUNT SIX

**CONSPIRACY TO VIOLATE AND/OR VIOLATION 2C:41-1, *et seq.*,
NEW JERSEY CIVIL RACKETEER INFLUENCED CORRUPT ORGANIZATIONS ACT
(NJ RICO)
(APPLICABLE TO US CHESS)**

114. Plaintiff repeats and realleges each and every allegation contained in the preceding paragraphs as if the same were set forth here at length.

115. Defendant US Chess is a RICO enterprise under N.J.S.A. 2C:41-1 *et seq.* It engages in activities that affect trade or commerce that affect the State of New Jersey.

116. At all times mentioned, Defendant, US Chess, participated in the affairs of the enterprise with others through a pattern of racketeering activity and embraced unlawful conduct as described herein with the same or similar purposes, results, participants or victims and their methods of commission are not isolated incidents.

117. The Defendant enterprise conspired with individual members of its Board, its executive officer(s), third party agents, co-conspirators including non-party prior board members, and directors presently and in the past who became associated with the enterprise.

118. They participated in the conduct of the affairs of the enterprise. The acts of various parties associated with the RICO entity Defendant US Chess **formed a pattern of racketeering acts as a regular way of doing business.** US Chess became the perfect vehicle to allow predators of children, women and the vulnerable to cross jurisdictional lines nationally and internationally.

119. By encouraging and promoting the well-known male chess players US Chess was able to obtain donations, entry fees for all those wishing to be around players like Ramirez, even though he was known to be a groomer, sexual predator and molester.

120. And as noted above, he was not the only one. US Chess then conspired with others as set forth above to coverup, conceal, protect, elevate the cash cow media advertiser home boys, all the while failing to protect, women, children and victims of sexual assault from worldwide predators.

121. They participated through a pattern of racketeering activity and with predicate acts that spanned decades, from fomenting chess players and elevating men's Grand Masters who give them the publicity and promotion to gain donors and registration fees that helps US Chess enable sex trafficking who abused women and children to attend chess matches national and international in order to facilitate abuse. For this US Chess received donor money fraudulently under the auspices of its 501(c)3 that was for education and promotion of chess but that was fraudulently put to continued use to facilitate abuse, gender victimization, sex abuse, sex assault, bias, retaliation.

122. New Jersey Civil Rico (Racketeer Influenced and Corrupt Organizations Act) N.J.S.A. 2C:41-1, *et seq.*, US Chess by its actions has become a Racketeering enterprise and via an agreement with named and unnamed Defendants, or wrongdoers mentioned herein conducted or participated in the conduct of the affairs of the enterprise and an agreement to the commission of at least two predicate acts which the enterprise received an income derived, directly or indirectly, from a pattern of racketeering activity in which individuals participated as a principal ... to use or invest, directly or indirectly, any part of the income or the proceeds of the income, in acquisition of any interest, or the establishment or operation of any enterprise which is engaged in or the activities of which affect trade or commerce including but not limited to other possible violations of law Chapter 21 of Title 2C prohibiting the use of false government documents (2C:21-2.1), false filings of public records (2C:21-3), deceptive business practices (2C:21-7), misconduct by a corporate official (2C:21-9), misapplication of entrusted property (2C:21-15), any or all are applicable here along with two predicate acts which must have occurred within four years from the date of this Complaint but which

brings conduct that spans back decades into acts that form a Pattern of Racketeering Activity as factually set forth herein.

123. As a direct and proximate cause of the Defendant's violation under New Jersey RICO enterprise under N.J.S.A. 2C:41-1 *et seq.*, Plaintiff Shahade has sustained damages that will be proven at the time of trial.

WHEREFORE, Plaintiff Jennifer Shahade hereby demands judgment against the Defendant, United States of America Chess Federation, an Illinois Corporation, a/k/a United States Chess Federation, d/b/a US Chess, John and Jane Does 1-50, ABC Companies 1-100, individually Persons or Entities the following relief as are allowed under this cause of action and asked for in the Prayer for Relief below.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff has been irreparably damaged as a result of the actions of Defendants pleaded above and prays that the Court enter Judgment in her favor and against Defendants, containing the following relief:

- a. A Declaratory Judgment that the actions, conduct, and practices of Defendants complained of herein violate the laws of the State of New Jersey;
- b. For a permanent Restraining Order against Defendants for their continued illegal actions against Defendant;
- c. For an award of damages against Defendants, in an amount to be determined at trial, plus pre-judgment interest, to compensate Plaintiff for all monetary and/or economic damages, including, but not limited to damages for reputational damages for false light, loss of past and future income, wages, compensation, and other benefits of employment;

d. An award of damages against Defendants, in an amount to be determined at Trial, plus pre-judgment interest, to compensate Plaintiff for all non-monetary and/or compensatory damages, including but not limited to, compensation for her mental anguish, humiliation, embarrassment, stress and anxiety, emotional pain and suffering, and emotional distress;

e. An award of punitive and/or exemplary damages as may be appropriate to any count, in an amount to be determined at trial;

f. An award of costs that Plaintiff has incurred in this action, including, but not limited to, expert witness fees, as well as Plaintiff's reasonable attorneys' fees and costs to the fullest extent permitted by law;

g. Such other and further relief as the Court may deem necessary, equitable, just and proper;

h. For an Order to prevent and restrain any acts that violates the New Jersey Civil RICO statute including divesting the Defendant of any monetary benefits it received by its continued operation, order restitution, imposing civil monetary penalties and further requiring the Defendant to forfeit monies obtained by fraud; to further order the dissolution or reorganization of the enterprise, including an order to cease and desist all conduct implemented that violate the rights of innocent persons pursuant to the statute;

i. Joint and Several Liability

j. Pre-judgment interest on all amounts due; and

k. An award for treble or other damages or attorneys' fees under any appropriate statute, common law or court rule.

1. Equitable relief, mandating defendants to implement an effective anti-harassment policy;

Linda Kenney Baden, Esq.
Of Counsel to Krenkel & Krenkel
Lead attorney for Plaintiff, Jennifer Shahade

A handwritten signature in blue ink, appearing to read "Linda Kenney Baden", written over a horizontal line.

By: _____
Linda Kenney Baden, Esq.

KRENKEL & KRENKEL
David A. Krenkel, Esq.
Attorneys for Plaintiff, Jennifer Shahade

By: David Krenkel
David A. Krenkel, Esq.

Dated: 16 July 2024

JURY DEMAND

Pursuant to R. 1:8-2(b), Plaintiff demands a trial by jury on all issues so triable.

Linda Kenney Baden, Esq.
Of Counsel to Krenkel & Krenkel
Lead attorney for Plaintiff, Jennifer Shahade

A handwritten signature in blue ink, appearing to read "Linda Kenney Baden", written over a horizontal line.

By:

Linda Kenney Baden, Esq.

Dated: 16 July 2024

TRIAL ATTORNEY DESIGNATION

Pursuant to R. 4:25-4, please be advised that Linda Kenney Baden, Esq. is hereby designated as trial counsel in the above-entitled matter.

Linda Kenney Baden, Esq.
Of Counsel to Krenkel & Krenkel
Lead attorney for Plaintiff, Jennifer Shahade

A handwritten signature in blue ink, appearing to read "Linda Kenney Baden", written over a horizontal line.

By:

Linda Kenney Baden, Esq.

Dated: 16 July 2024

DEMAND FOR INSURANCE COVERAGE

Defendants are demanded to provide a complete copy of their applicable insurance policies and declaration sheets demonstrating coverage within thirty (30) days of service of this Complaint.

Linda Kenney Baden, Esq.
Of Counsel to Krenkel & Krenkel
Lead attorney for Plaintiff, Jennifer Shahade

A handwritten signature in blue ink, appearing to read "Linda Kenney Baden", written over a horizontal line.

By: _____
Linda Kenney Baden, Esq.

Dated: 16 July 2024

**DEMAND FOR AFFIDAVIT OF COMPLIANCE
FOR LITIGATION HOLD/PRESERVATION NOTICE**

On February 9, 2024, Plaintiff's attorney sent a litigation hold letter by e-mail to Ranae Bartlett, Director of Operations, Executive Director (Interim at the time) which was acknowledged received for preservation of "all such information and documents, originals and copies, whether in hard copy or electronically stored on any personal computer or other device to include preservation of all metadata relative to the electronically-stored information. The documents and information that need to be preserved include, but are not limited to, items such as:

- All documents related to Jennifer Shahade, including personnel files but not limited to same, as well as
- Letters;
- Memoranda;

- Agreements or Contracts;
- E-mails including attachments;
- Notes (handwritten, typewritten, or electronic);
- Other computer files;
- Computer metadata files;
- Facebook or the social media posts;
- Telephone messages and voice mail;
- Text messages; and
- All personal e-mail accounts of the Board members from 2018 to now be preserved;

and any other data compilations from which information can be obtained and translated into reasonably usable form, including any electronically stored documentation, related in any way to Ms. Shahade's relationship with or employment with US Chess, including any and all alleged claims of which you will have more information in our follow-up notification to you.”

Linda Kenney Baden, Esq.
Of Counsel to Krenkel & Krenkel
Lead attorney for Plaintiff, Jennifer Shahade

A handwritten signature in blue ink, appearing to read "Linda Kenney Baden", written over a horizontal line.

By:

Linda Kenney Baden, Esq.

Dated: 16 July 2024

CERTIFICATION

PURSUANT to R. 4:5-1, the undersigned certifies that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding nor is any other action or arbitration proceeding contemplated. As of this date, I know of no other parties who should be joined.

Linda Kenney Baden, Esq.
Of Counsel to Krenkel & Krenkel
Lead attorney for Plaintiff, Jennifer Shahade

A handwritten signature in blue ink, appearing to read "Linda Kenney Baden", written over a horizontal line.

By:

Linda Kenney Baden, Esq.

Dated: 16 July 2024

Civil Case Information Statement

Case Details: MONMOUTH | Civil Part Docket# L-002326-24

Case Caption: SHAHADE JENNIFER VS UNITED STATES
OF AME RICA CH

Case Initiation Date: 07/16/2024

Attorney Name: DAVID ALLEN KRENKEL

Firm Name: KRENKEL & KRENKEL, LLC

Address: 107 MAIN ST

ALLENHURST NJ 07711

Phone: 7325319300

Name of Party: PLAINTIFF : Shahade, Jennifer

Name of Defendant's Primary Insurance Company
(if known): Unknown

Case Type: LAW AGAINST DISCRIMINATION (LAD) CASES

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

**Do you anticipate adding any parties (arising out of same
transaction or occurrence)?** NO

Does this case involve claims related to COVID-19? NO

Are sexual abuse claims alleged by: Jennifer Shahade? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

**Use this space to alert the court to any special case characteristics that may warrant individual
management or accelerated disposition:**

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO
Medical Debt Claim? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*

07/16/2024
Dated

/s/ DAVID ALLEN KRENKEL
Signed

